

MENKEN SIMPSON & ROZGER LLP

80 PINE STREET, 33RD FLOOR
NEW YORK, NEW YORK 10005

TELEPHONE: (212) 509-1616

FACSIMILE: (212) 509-8088

WWW.NYEMPLOYEEELAW.COM

BRUCE E. MENKEN
SCOTT SIMPSON
JASON J. ROZGER ²
BRENNA RABINOWITZ
RAYA F. SAKSOUK

² ALSO ADMITTED N.Y.

ALAN SERRINS
OF COUNSEL

VIA ECF

June 20, 2025

Hon. Joan M. Azrack
District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Agudelo et. al. v. Recovco Mortgage Management LLC et. al.*
Case No. 22-cv-4004

Dear Judge Azrack:

This law firm represents Plaintiffs in the above-captioned matter. We write to request an eleven-day extension, to July 8, 2025, of the deadline for Plaintiffs' Objections to the Report and Recommendations ("R&R") issued by Magistrate Judge Dunst on June 13, 2025. *See* ECF No. 269. The thirty-five-page R&R draws sweeping conclusions and makes broad recommendations about large portions of Plaintiffs' claims that were not even before the Court on the pending Motions to Dismiss,¹ and Plaintiffs need time to coordinate objections from all four different law offices representing Plaintiffs and prospective Plaintiffs in this case.

Although Plaintiffs have not stood in the way of multiple extension requests by Defendants, *see, e.g.*, ECF Nos. 249 and 262, Defendants Salzman and Wright have refused to extend the same courtesy. In response to our June 20, 2025, request for an extension, Defendant Salzman simply refused without explanation. Counsel for Defendant Wright admitted that he "traditionally consent[s] to requests like this," yet refused to grant consent because he "believe[s] the court's decision is sound (and fair and just), and that [Plaintiffs] should forgo the objections phase of the process, accept the decision and proceed against the parties that remain." Needless to say, if attorneys are to refuse the common courtesy of brief extensions on the basis that they disagree with the position of opposing counsel, no such consent would ever be given.

Counsel for Defendant Pallante had not yet responded as of the time of this filing.

Plaintiffs request that the Court grant this brief extension and set a new deadline of July 8, 2025, for their Objections to the R&R.

¹ *See, e.g.*, ECF No. 269, pp. 34-35.

Sincerely,

/s/ Brenna Rabinowitz

Brenna Rabinowitz

Bruce Menken

Menken Simpson & Rozger LLP

80 Pine Street, 33rd Floor

New York, New York 10005

(212) 509-1616

bmenken@nyemployeelaw.com

brabinowitz@nyemployeelaw.com